

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<p>CROSS ATLANTIC CAPITAL PARTNERS, INC.,</p> <p style="text-align:center">Plaintiff,</p> <p style="text-align:center">v.</p> <p>FACEBOOK, INC. and THEFACEBOOK, LLC,</p> <p style="text-align:center">Defendants.</p>	<p><b>CIVIL ACTION</b></p> <p><b>NO. 07-CV- 02768-JP</b></p> <p><b>JURY TRIAL DEMANDED</b></p>
--	--

**DECLARATION OF HEIDI L. KEEFE ATTACHING EXHIBITS  
TO DEFENDANT FACEBOOK'S MEMORANDUM IN SUPPORT  
OF ITS PROPOSED CLAIM CONSTRUCTION**

I, Heidi L. Keefe, declare:

1. I am an attorney with White & Case LLP, counsel of record in this action for Facebook, Inc. and Thefacebook, LLC (collectively "Facebook"). I make this declaration in support of Defendant Facebook's Memorandum in Support of its Proposed Claim Construction. I have personal knowledge of the facts contained within this declaration, and if called as a witness, could testify competently to the matters contained herein.
2. Attached hereto as Exhibit A is a true and correct copy of U.S. Patent No. 6,519,629.
3. Attached hereto as Exhibit B is a collection of exemplary claims from the '629 patent to allow the Court to analyze the disputed claim terms in use.
4. Attached hereto as Exhibit C is a true and correct copy of the portions of *Webster's II New College Dictionary*, Houghton Mifflin Company, 1999 that are cited in Facebook's Memorandum in Support of its Proposed Claim Construction.

5. Attached hereto as Exhibit D is a true and correct copy of the portions of *Microsoft Press Computer Dictionary*, Microsoft Press, 1991 that are cited in Facebook's Memorandum in Support of its Proposed Claim Construction.

6. Attached hereto as Exhibit E is a true and correct copy of the portions of *Microsoft Press Computer Dictionary*, Microsoft Press, 1999 that are cited in Facebook's Memorandum in Support of its Proposed Claim Construction.

7. Attached hereto as Exhibit F is a true and correct copy of *Cybersettle, Inc. v National Arbitration Forum, Inc.*, C.A. Fed. (N.J.), 2007.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 11, 2008, at Palo Alto, California.

/s/ Heidi L. Keefe

Heidi L. Keefe

## **CERTIFICATE OF SERVICE**

This is to hereby certify that on this 11th day of January, 2008, I caused a true and correct copy of the foregoing document: Declaration of Heidi L. Keefe Attaching Exhibits to Defendant Facebook's Memorandum in Support of its Proposed Claim Construction to be served via this Court's Electronic Filing ("ECF") System, upon the following:

Frederick A. Tecce, Esq.  
McShea/Tecce, P.C.  
The Bell Atlantic Tower – 28th Floor  
1717 Arch Street  
Philadelphia, PA 19103  
[ftecce@mcshea-tecce.com](mailto:ftecce@mcshea-tecce.com)

Thomas J. Duffy, Esq.  
Patrick J. Keenan, Esq.  
Duffy & Keenan  
The Curtis Center, Suite 1150  
Independence Square West  
Philadelphia, PA 19106  
[pjk@duffykeen.com](mailto:pjk@duffykeen.com)

Counsel for plaintiff  
Cross Atlantic Capital Partners, Inc.

/s/ Heidi L. Keefe  
Heidi L. Keefe